

**Summary of Public Comments on the Proposed
Ordinance to Revise and Amend Chapter 9 (*Fire Safety Code*)**

#	Commenter	Date	Issue/Topic	Comment	Response/Change to Ordinance
1	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article IV Sec. 9-74 Subsec. 10.11.6.1	This section should provide some clarification of the intent of the requirement with regards to roof decks and similar areas of large commercial buildings.	Language in code section has been changed to reflect the intent of the requirement to maintain the defined distance from vertical portions of the structure.
2	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article IV Sec. 9-74 Subsec.10.1 1.10.3	The term combustible materials may include backyard grass. Consider replacing combustible “materials” with “accessory structures” or combustible storage.	Language of code section has been changed to better clarify intent by using terms suggested.
3	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article IV Sec. 9-74 Subsec. 13.6.2	Add ambulatory healthcare and day care to the list of occupancies requiring a fire extinguisher	Language in code changed to require fire extinguishers in Ambulatory Health Care Facilities, Apartment Buildings, Educational Occupancies, Day-Care Occupancies, and Hotel/Dormitory Occupancies.
4	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article IV Sec. 9-74 Subsec. 18.2.2.1	Consider adding the phrase “during an emergency” to the end of the requirement	No change made to this code section. As written, the code requires an individual to be present at any time a response agency needs access to the facility or building when an access box is not provided.
5	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article V Sec.9-81	Change the wording from Shell business use to shell commercial use so as not to limit the requirement only to those buildings falling under the business occupancy use group. Using commercial will better clarify the intent	Language of code section has been changed using the recommended term of commercial as opposed to business which clarifies the intent of the section.

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6	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article V Sec. 9-91 Subsec. 8.8.1	Consider defining complex structures in the Code to better clarify where this requirement is applicable. Additionally change manual means of fire protection to fire hose valve. In the last sentence require at least one of the valves to be in the stair which allows for multiple valves (multiple systems/zones) on the floor. The current requirement could be interpreted to indicate that there must be one valve for each floor.	No change has been made to this code section. The language of this requirement mirrors Chapter 5 and is not limiting with regards to number of valves or what is required in the area in question.
7	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article V Sec.9-91 Subsec. 11.8.3.1	The second sentence should be amended to say that at least one control valve and waterflow device shall be provided for each floor which allow for multiple control valves and waterflow devices on the floor. The current language indicates that only one of each device is permitted on each floor.	Code language has been changed to require at least one waterflow device and control valve shall be provided for each floor allowing for the possibility of multiple devices and valves based on system design.
8	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VI Sec. 9-91 Subsec. 8.16.1.1.1.5	Amend the requirement to allow for multiple devices on each floor as opposed to requiring a singular device of each type on each floor.	Please see response #7 for how item has been addressed. This comment was made because the code section is different however the response is the same.
9	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VI Sec. 9-105 Subsec. 8.16.1.1.1.6 (3)	This is a requirement in an exception which typically is avoided in codes. This should become its own section so that it stands out more readily.	No change in the language has been made. Staff believes that the format of the section follows the manual of style of NFPA codes and as such does not need revision.
10	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VI Sec.9-105 Subsect. A23.3, Sec.9-106 Subsec. A6.1.5, Sec. 9-107 Subsec.	Define supply point or use a more descriptive term to clarify where the safety factor is to be calculated.	Annex language has been changed to use the term effective point of the system which staff believes will clarify the intent of the code section being expanded upon.

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11	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VI Sec. 9-108, Subsec. 8.2.2.1	Potential conflict with code requirements of 7.10.1.3.1.2 of NPFA 14.	No change has been made to the code section. In reviewing the code section proposed and the code section provided by commenter, staff believes that this requirement is more stringent than what is required in the model code but does not conflict.
12	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VII Sec.9-120, Subsec. 18.3.7	Consider moving to 10.5.6.3 and making the requirement speak to a 20% safety factor for the amp loading which would allow for field flexibility without severely limiting the number of devices that could be provided on a NAC panel and causing great construction expense due to the number of panels that would now be required for a fire alarm system. Language could be similar to that of the sprinkler safety requirements and would align with the County and meet the intent of this section.	Code language has been changed to require a 20% safety factor for amperage calculations and has removed the battery capacity requirements which allows for the code section to remain in its current location, meet the original intent of the requirement (allowing for field modifications)
13	Eric Mayl, P.E. (Fire Code Advisory Committee)	10/4/2012	Article VIII, Sec.9-142, Subsec. 7.8.1 and 10.2.2.1	The 2008 edition of the Code is referenced in these sections. This should be the 2011 edition as noted in Section 9-136.	Code language has been changed to reflect the appropriate edition of the code to be adopted.
14	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article IV Sec.9-74, Subsec. 20.16.2.1	The requirement for 2-way communication in the fire department equipment room is redundant with the firefighter phone system. Additionally, clarification should be provided as to what is desired for the self-contained breathing apparatus (SCBA) fill stations.	No change has been made in the code language. This requirement is based on fire department operations and mirrors the requirements of Montgomery County and the City of Gaithersburg. The requirement can be found in the International Building Code and has simply been clarified in the code language. Montgomery County Fire and Rescue Services should be consulted with regards to the SCBA fill station requirements as these are dependent on the type of equipment currently used by the organization.

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15	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article V, Sec. 9-81,	Why did we go with 65 sq. ft? What is the basis for this number?	This requirement aligns with Montgomery County Executive Regulations and is a fairly standard figure used by architects and engineers when designing buildings. Staff believes that this will allow for less confusion from design professionals and prevent the need for expensive building modification as the building changes uses over the course of its existence.
16	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article V Sec. 9-91, Subsec.8.8.1	Should we define complex structures? Where is this defined currently and should we include it in the code?	Item has been addressed. Please see response # 6.
17	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article V Sec. 9-91, Subsec. 9.6.2.6	Should the location of the manual pull station be in this code?	Staff does not believe that a change to the code language is necessary. NPFA 72 provides clear guidance as to the location of manual pull stations.
18	Chris Conroy, SET (Sent via email)	9/27/2012	Article VI Secs. 9-105 Subsec. A23.3, 9- 106 Subsec. A6.1.5, 9- 107 Subsec. A9.7.1	Why should gridded systems not be considered as a means to effectively mitigate the safety factor issue?	The language provided in the code matches that of Montgomery County's requirements and as such, staff does not believe that a change is needed.
19	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article VII Sec. 9-120 Subsec. 18.3.7	This section seems onerous and looks to limit severely the number of devices capable of being connected to each NAC circuit. If the intent is to allow for some field modification then a designated safety factor would be better. This requirement will cause many otherwise unneeded NAC panels on each floor.	Code language has been changed. Please see response # 12.

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20	Isa Saah, P.E. (Fire Code Advisory Committee)	9/27/2012	Article VII Sec. 9-120 Subsec. 24.5.1.11	Include that this requirement should apply to the fire department equipment rooms as well where required.	Code language has been changed as recommended to require that firefighter telephones be provided in fire department equipment rooms when such rooms are required.
21	Ed Mullaney-JBG (Sent via email)	9/27/2012	Article IV Sec. 9-74 Subsec. 18.2.3.1- 18.5.8	It is nice to have these requirements specifically spelled out in the code as they are here.	No change in code language required. Staff is grateful for the acknowledgment of the overall intent of this project.
22	Ed Mullaney-JBG (Sent via email)	9/27/2012	Article V Sec. 9-81 Subsec.7.3.1 .2	The 65 sq. ft. per person required is the same as Montgomery County has utilized for years. We concur with the logic of having shell building components of egress sized to allow for future tenants assembly occupancies (which for a long time the COR did not require), but have found the 65 sq. ft. per person to be overly generous for most typical tenant floors ins buildings resulting in larger than needed stairs and doors. The commenter recommends using a 75-80 sq. ft. per person occupant load factor as a more adequate and accurate figure for typically encountered situations.	Comment has been previously addressed. Please see response # 15.
23	Ed Mullaney-JBG (Sent via email)	9/27/2012	Article V Sec. 9-91 Subsec. 7.7.4.1	Prohibiting flagstones (pavers) set in gravel seems overly restrictive	No change in code language has been made. This requirement aligns with Chapter 5 and provides for a maintainable path of egress away from the building in compliance with the requirements and intent of the model codes.
24	Ed Mullaney-JBG (Sent via email)	9/27/2012	Article V Sec. 9-91 Subsec. 11.8.6.1	When JBG has met with the local first responding units since the high rise code first required a command center, we have been frequently told that having the command center off of one of the stairs, near the service area of the building worked very well	No code language change has been made. This requirement aligns with Montgomery County requirements and Fire Department operations concepts. Staff believes that the requirements, as written, allow for options regarding the location of the required emergency command center

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				for them as it was convenient to the electrical room that they needed access to. As this section is written, it will force the command center of a high rise building to be located just off of the main lobby with a door to the outside. This is overly restrictive.	without compromising leasable space or aesthetics of the building while allowing responders to easily and quickly locate the required facilities to allow them to operate effectively in these specialized structures.
25	Pam McHugh (Sent via email)	9/14/2012	None Given	I have often wondered why business and residents do not have guidelines to display address numbers in a consistent manner. I would imagine it would speed up the time to respond to a fire or other city services such as ambulance or police requests. I know as being a resident of Rockville and Montgomery County how difficult it is to find an address. Some establishments do not have the street numbers displayed or are displayed in a place that is difficult to access. This easily could become a hazard causing accidents that would need county/city assistance.	No code language change has been made. Premises identification is addressed in Article II of Chapter 9 and Article III of Chapter 5. The maintenance and marking of existing buildings is the addressed in the City's Property Maintenance Code.
26	Michael Rose (At public comment Mayor and Council session)	10/8/2012	None Given	Has "ADL" home security system which will alert the fire department in the event of a fire. This provides an increased level of safety as does sprinklers and is a good idea.	No code language change has been made. Staff agrees that home security systems increase the safety level of a home or business but do not believe that a code requirement would be prudent at this time.
27	Various	Various	Throughout	Grammatical and code numbering changes (numbers duplicated or out of order) and correction of typographical errors.	Changes made as appropriate and where needed throughout the document.